

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ZEN JV, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11195 (JKS)

(Jointly Administered)

Hearing Date: Jan. 27, 2026 at 2:30 p.m. (ET)

Objection Deadline: Dec. 10, 2025 at 4:00 p.m. (ET)

**SUMMARY OF COMBINED FOURTH MONTHLY AND FINAL
FEE APPLICATION OF COLE SCHOTZ P.C., COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE
MONTHLY PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025
AND THE FINAL PERIOD FROM JULY 2, 2025 THROUGH OCTOBER 14, 2025**

Name of Applicant:

Cole Schotz P.C.

Authorized to provide professional
services to:

**Official Committee of Unsecured Creditors of
Zen JV, LLC, *et al.***

Date of retention:

**August 8, 2025 (Effective as of July 2, 2025)
[D.I. 293]**

Monthly Period for which compensation
and reimbursement is sought:

October 1, 2025 through October 14, 2025

Amount of compensation sought as
actual, reasonable and necessary for
Monthly Period:

\$35,842.40 (80% of \$44,803.00)

Amount of expense reimbursement sought
as actual, reasonable and necessary
for Monthly Period:

\$0.00

Final Period for which final compensation
and reimbursement is sought:

July 2, 2025 through October 14, 2025

¹ The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

Amount of compensation sought as
actual, reasonable and necessary for
Final Period: **\$798,332.50**

Amount of expense reimbursement sought
as actual, reasonable and necessary for
Final Period: **\$6,651.06**

This is a(n): X monthly interim X final application

Prior Monthly Fee Applications Filed:

Application		Requested Fees and Expenses		Allowed Fees and Expenses		Unpaid Fees and Expenses	
Monthly Fee Period, Docket No., Date Filed	CNO Docket No., Date Filed	Total Fees Requested	Total Expenses Requested	Fees - Amount Allowed	Expenses - Amount Allowed	Unpaid Fees	Unpaid Expenses
7/2/2025– 7/31/2025 D.I. 316 8/26/2025	D.I. 423 10/6/25	\$378,494.00	\$4,979.91	\$378,494.00	\$4,979.91	\$0.00	\$0.00
8/1/2025– 8/31/2025 D.I. 358 9/12/2025	D.I. 373 9/17/25	\$272,385.50	\$865.29	\$272,385.50	\$865.29	\$0.00	\$0.00
9/1/25–9/30/25 D.I. 480 10/29/25	N/A ²	\$102,922.50	\$805.86	\$0.00	\$0.00	N/A	N/A
Total		\$753,802.00	\$6,651.06	\$650,879.50	\$5,845.20	\$0.00	\$0.00

² The deadline to object to the Third Monthly Fee Application is November 19, 2025 at 4:00 p.m. (ET).

Prior Interim Fee Application Filed:

Application/ D.I. No.	Date Filed	Period Covered	Requested Fees/Expenses	Approved Fees/ Expenses
First Interim Application [D.I. 380]	9/22/2025	7/2/2025 – 8/31/2025	\$650,879.50/ \$5,845.20	\$650,607.00 ³ / \$5,845.20

³ Reflects voluntary reductions by Cole Schotz P.C. in the aggregate amount of \$272.50 based on informal comments received from the Court.

ZEN JV, LLC, ET AL.

**SUMMARY OF BILLING BY PROFESSIONAL
FOR THE MONTHLY PERIOD FROM
OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025**

Attorney Name	Year Admitted	Position (Department)	Hourly Billing Rate⁴	Total Hours Billed	Total Compensation
Justin R. Alberto	2008	Member (Bankruptcy)	\$1,150.00	12.0	\$13,800.00
Steven L. Klepper	1993	Member (Litigation)	\$1,035.00	2.1	\$2,173.50
Sarah A. Carnes	2015	Member (Bankruptcy)	\$1,000.00	16.1	\$16,100.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$875.00	1.9	\$1,662.50
Jonathan R. Friedman	2019	Associate (Bankruptcy)	\$680.00	7.9	\$5,372.00
			\$340.00 ⁵	1.3	\$442.00
Elazar A. Kosman	2022	Associate (Bankruptcy)	\$485.00	5.3	\$2,570.50
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$485.00	2.5	\$1,212.50
Larry S. Morton	N/A	Paralegal	\$420.00	3.5	\$1,470.00
TOTAL				52.6	\$44,803.00

⁴ This rate is Cole Schotz's regular hourly rate for legal services. All hourly rates are adjusted by Cole Schotz on a periodic basis (the last such adjustment occurred on September 1, 2025).

⁵ Consistent with Local Rule 2016-1(d)(ix), this application describes non-working travel time separately and bills travel time at no more than half of Cole Schotz's regularly hourly rates.

ZEN JV, LLC, *ET AL.***SUMMARY OF COMPENSATION BY PROJECT
CATEGORY FOR THE MONTHLY PERIOD FROM
OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025**

Project Category	Actual Hours	Actual Fees
Case Administration	2.4	\$1,060.00
Claims Analysis	0.7	\$700.00
Committee Matters and Creditor Meetings	1.1	\$1,115.00
Executory Contracts	1.2	\$1,153.00
Fee Application Matters/Objections	5.9	\$2,895.50
Non-Working Travel Time	1.3	\$442.00
Preparation for and Attendance at Hearings	6.0	\$4,584.50
Reorganization Plan	31.1	\$29,759.50
Retention Matters	0.8	\$920.00
General	2.1	\$2,173.50
TOTAL	52.6	\$44,803.00

ZEN JV, LLC, *ET AL.*

**EXPENSE SUMMARY
FOR THE MONTHLY PERIOD FROM
OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025**

Expense Category	Service Provider (if applicable)	Total Expenses
N/A		\$0.00
TOTAL		\$0.00

ZEN JV, LLC, ET AL.**SUMMARY OF BILLING BY PROFESSIONAL
JULY 2, 2025 THROUGH OCTOBER 14, 2025**

Attorney Name	Year Admitted	Position (Department)	Hourly Billing Rate ⁶	Total Hours Billed	Total Compensation
Justin R. Alberto	2008	Member (Bankruptcy)	\$1,150.00	31.1	\$35,765.00
			\$925.00	104.8	\$96,940.00
Steven L. Klepper	1993	Member (Litigation)	\$1,035.00	3.8	\$3,933.00
			\$960.00	32.4	\$31,104.00
Seth Van Aalten	2004	Member (Bankruptcy)	\$1,375.00	1.9	\$2,612.50
			\$1,150.00	37.2	\$42,780.00
Sarah A. Carnes	2015	Member (Bankruptcy)	\$1,000.00	47.1	\$47,100.00
			\$900.00	266.8	\$240,120.00
			\$450.00 ⁷	2.5	\$1,125.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$875.00	1.9	\$1,662.50
Krista L. Kulp	2013	Special Counsel (Litigation)	\$670.00	32.6	\$21,842.00
Jonathan R. Friedman	2019	Associate (Bankruptcy)	\$680.00	53.7	\$36,516.00
			\$340.00	1.3	\$442.00
			\$620.00	164.6	\$102,052.00
Elazar A. Kosman	2022	Associate (Bankruptcy)	\$485.00	27.7	\$13,434.50
			\$430.00	117.9	\$50,697.00
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$485.00	3.8	\$1,843.00
			\$430.00	108.6	\$46,698.00
			\$215.00	2.9	\$623.50
Kellen J. Sweeney	N/A	Law Clerk	\$300.00	18.8	\$5,640.00
Larry S. Morton	N/A	Paralegal	\$420.00	9.1	\$3,822.00
			\$400.00	15.5	\$6,200.00
Christopher D. Sindo	N/A	Lit. Support	\$440.00	6.8	\$2,992.00
Daniel N. Sullivan	N/A	Lit. Support	\$475.00	1.2	\$570.00
Bryan E. Navas	N/A	Lit. Support	\$440.00	2.2	\$968.00
Pauline Z. Ratkowiak	N/A	Paralegal	\$425.00	1.4	\$595.00
Jaya Gajjavelli	N/A	Lit. Support	\$440.00	1.2	\$528.00
TOTAL				1,098.8	\$798,605.00
TOTAL AFTER REDUCTION					\$798,332.50

Total Requested Compensation: \$798,332.50**Total Attorney Compensation: \$777,290.00****Blended Rate All Attorneys: \$745.53****Blended Rate All Timekeepers: \$726.80**

⁶ Cole Schotz adjusted its hourly rates on September 1, 2025. This application describes the amounts accrued using pre-adjustment rates separate from amounts accrued using post-adjustment rates.

⁷ Consistent with Local Rule 2016-1(d)(ix), this application describes non-working travel time separately and bills travel time at no more than half of Cole Schotz's regularly hourly rates.

ZEN JV, LLC, ET AL.**COMPENSATION BY PROJECT CATEGORY
JULY 2, 2025 THROUGH OCTOBER 14, 2025**

Project Category	Actual Hours	Actual Fees
Asset Dispositions, Sales, Uses and Leases (Section 363)	179.1	\$138,304.50
Case Administration	61.0	\$30,679.50
Cash Collateral and DIP Financing	133.6	\$93,066.50
Claims Analysis	6.6	\$6,012.50
Committee Matters and Creditor Meetings	113.6	\$80,436.50
Creditor Inquiries	0.9	\$546.50
Disclosure Statement/Voting Issues	0.5	\$215.00
Employee Matters	1.4	\$602.00
Executory Contracts	10.1	\$6,315.50
Fee Application Matters/Objections	44.2	\$21,981.00
Non-Working Travel Time	6.7	\$2,190.50
Litigation/ Gen. (Except Automatic Stay Relief)	4.0	\$2,096.00
Preparation for and Attendance at Hearings	31.9	\$21,522.50
Reorganization Plan	172.2	\$152,488.50
Reports; Statements and Schedules	0.9	\$770.50
Retention Matters	27.4	\$15,377.00
U.S. Trustee Matters and Meetings	0.1	\$92.50
Budgeting (Case)	1.1	\$644.00
Business Operations	4.3	\$3,066.00
Document Review/ Committee Investigation	297.1	\$220,024.50
General	2.1	\$2,173.50
TOTAL	1,098.8	\$798,605.00
TOTAL AFTER REDUCTION		\$798,332.50

ZEN JV, LLC, ET AL.**EXPENSE SUMMARY
JULY 2, 2025 THROUGH OCTOBER 14, 2025**

Expense Category	Service Provider (if applicable)	Total Expenses
Photocopying/Printing/Scanning (7,352 pages @ \$0.10/page)		\$735.20
Court Fees	PACER	\$83.90
Discovery/Exhibits Preparation		\$952.70
Filing Fees	PACER	\$100.00
Online Research	Westlaw/LEXIS	\$2,346.63
Transcripts	Reliable	\$79.75
Couriers	Parcels/Reliable	\$427.11
Travel		\$1,525.49
Data Host		\$252.00
Working Meals		\$148.28
TOTAL		\$6,651.06

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ZEN JV, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11195 (JKS)

(Jointly Administered)

Hearing Date: Jan. 27, 2026 at 2:30 p.m. (ET)

Objection Deadline: Dec. 10, 2025 at 4:00 p.m. (ET)

**COMBINED FOURTH MONTHLY AND FINAL FEE
APPLICATION OF COLE SCHOTZ P.C., COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE
MONTHLY PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025
AND THE FINAL PERIOD FROM JULY 2, 2025 THROUGH OCTOBER 14, 2025**

Cole Schotz P.C. (the “Applicant” or “Cole Schotz”), counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Zen JV, LLC, *et al.*, and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby submits this application (the “Application”) pursuant to (i) sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) the *Order Pursuant to 11 U.S.C. §§ 331, 330, and 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* [Docket No. 258] (the “Interim Compensation”

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

Order”),² for allowance of compensation for services rendered and reimbursement of expenses for the monthly period from October 1, 2025 through October 14, 2025 (the “Monthly Period”) and the final period from July 2, 2025 through October 14, 2025 (the “Final Period”). In support of this Application, Cole Schotz respectfully represents as follows:

Jurisdiction and Venue

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. §1334, which was referred to the United States Bankruptcy Court for the District of Delaware under 28 U.S.C. § 157 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b) and, pursuant to Local Rule 9013-1(f), the Committee consents to entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code. Such relief also is warranted under Bankruptcy Rule 2016, Local Rule 2016-1 and the Interim Compensation Order.

Background

A. The Chapter 11 Cases

3. On June 24, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Since the Petition Date, the Debtors have remained in possession of their assets and have continued to

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Interim Compensation Order or the Confirmation Order, as applicable.

operate and manage their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On July 2, 2025, the United States Trustee for Region 3 (the “U.S. Trustee”) appointed the Committee, which is comprised of the following members: (i) Jobverse, Inc. (ii) Textkernel B.V., c/o Bullhorn Inc., (iii) Talroo, Inc., (iv) Verinext Inc., (v) Appcast, Inc., (vi) Jobcase, Inc., and (vii) Equinix, Inc. *See* Docket No. 65. The Committee selected Verinext Inc. as the chairperson of the Committee. On September 18, 2025, Equinix, Inc. provided a notice of resignation to counsel to the Committee and resigned from the Committee.

B. The Retention of Cole Schotz

5. On July 23, 2025, the Committee applied to the Court for an order authorizing the retention and employment of Cole Schotz as counsel to the Committee, effective as of July 2, 2025. *See* Docket No. 203.

6. On August 8, 2025, the Court entered the *Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Counsel to the Official Committee of Unsecured Creditors Effective as of July 2, 2025* [Docket No. 293] authorizing the retention and employment of Cole Schotz as counsel to the Committee.

C. The Interim Compensation Order

7. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases. Specifically, the Interim Compensation Order provides that at three-month intervals (the “Interim Fee Period”), retained professionals shall file with the Court an application (an “Interim Fee Application”) for interim approval and allowance of compensation and reimbursement of expenses sought by such Retained Professional in its Monthly Fee Applications.

D. The Confirmation Order

8. On October 7, 2025, the Court entered the *Findings of Fact, Conclusion of Law, and Order (I) Approving the Adequacy of the Debtors' Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation on a Final Basis and (II) Confirming the Debtors' Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation* [Docket No. 429] (the "Confirmation Order").

9. On October 14, 2025, the Debtors filed the *Notice of (A) Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Debtors' Second Amended Combined Disclosure Statement and Joint Plan of Liquidation on a Final Basis and (II) Confirming the Debtors' Second Amended Combined Disclosure Statement and Joint Plan of Liquidation and (B) Effective Date* [Docket No. 458] (the "Effective Date Notice"), which provided notice of the Effective Date occurring on October 14, 2025.

10. Pursuant to the Confirmation Order, each Professional who holds or asserts a Professional Fee Claim is required to file with the Court, and serve on all parties required to receive notice, a Final Fee Application within forty-five days after the Effective Date for final Allowance of compensation for services rendered and reimbursement of expenses incurred. *See* Confirmation Order par. 14; Plan Art. VI.B. Accordingly, the bar date and deadline for Professional Fee Claims to be filed is December 1, 2025.

RELIEF REQUESTED

11. By this Application, and pursuant to the Interim Compensation Order, the Confirmation Order, and sections 330 and 331 of the Bankruptcy Code, Cole Schotz is seeking: (i) compensation in the amount of \$35,842.40, which is equal to eighty percent (80%) of the \$44,803.00 in fees for professional services rendered by Cole Schotz during the Monthly Period and (ii) compensation in the amount of \$798,332.50 in fees for professional services rendered by

Cole Schotz during the Final Period. This amount is derived solely from the applicable hourly billing rates of Cole Schotz personnel who rendered such services to the Committee. In addition, Cole Schotz is seeking reimbursement of expenses incurred during: (i) the Monthly Period in the amount of \$0.00 and (ii) the Final Period in the amount of \$6,651.06.

A. Compensation Requested

12. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by Cole Schotz with respect to the Chapter 11 Cases during the Monthly Period and Final Period. This detailed itemization complies with Local Rule 2016-1(d) in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified. *See* DEL. BANKR. L.R. 2016-1(d).

13. The attorneys and professionals who rendered services related to each category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation.

B. Expense Reimbursement

14. Cole Schotz incurred out-of-pocket expenses during: (i) the Monthly Period in the amount of \$0.00 and (ii) the Final Period in the amount of \$6,651.06. Attached hereto as **Exhibit B** is a description of the expenses actually incurred by Cole Schotz in the performance of services rendered as counsel to the Committee. The expenses are broken down into categories of charges, including, among other things, the following charges: photocopying, scanning and

printing, Court fees, discovery exhibits, filing fees, legal research, delivery services, data hosting charges, and other non-ordinary expenses. *See* DEL. BANKR. L.R. 2016-1(e).³

THE APPLICATION AND COMPLIANCE WITH GUIDELINES

15. This Application was prepared in accordance with (a) Local Rule 2016-1, (b) the United States Trustee *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, adopted on June 11, 2013 (the “UST Guidelines”), and (c) the Interim Compensation Order (collectively with Local Rule 2016-1 and the UST Guidelines, the “Guidelines”).

16. In addition to the summary of billing by project category and summary of billing by professional attached to the Application as **Exhibit A** and summary of expenses attached to the Application as **Exhibit B**, annexed hereto as **Exhibit C** are the other various schedules required by the Guidelines, as applicable.

17. Cole Schotz provides the following responses to the questions set forth under ¶ C.5 of Appendix B of the UST Guidelines:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: No. Cole Schotz professionals working on this matter billed at Cole Schotz’s standard hourly rates.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: The fees sought in this Application are less than the amount budgeted for the Final Period.

³ In accordance with Local Rule 2016-1(e)(iii), Cole Schotz does not charge more than \$0.10 per page for photocopies, does not charge for incoming facsimile transmissions, and does not charge more than \$0.25 per page for outgoing facsimiles. Applicant does not surcharge for computerized research. DEL. BANKR. L.R. 2016-1(e)(iii).

Question: Have any of the professionals included in this fee application varied their hourly rates based on the geographic location of the bankruptcy case.

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? If so, please quantify by hours and fees.

Response: Yes. Approximately .9 hours were spent reviewing invoices, which amounted to \$387.00.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include rate increases since retention?

Response: Yes. All hourly rates are adjusted by Cole Schotz P.C. on a periodic basis. The last such adjustment occurred on September 1, 2025.

REASONABLE AND NECESSARY SERVICES

18. The services for which Cole Schotz seeks compensation were, at the time rendered, necessary for, beneficial to and in the best interests of the Committee and the Debtors' estates. The services rendered were consistently performed in a timely manner commensurate with the complexity, importance and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Cole Schotz is fair and reasonable given (a) the complexity of these Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

CERTIFICATION OF COMPLIANCE AND WAIVER

19. The undersigned representative of Cole Schotz certifies that he has reviewed the requirements of Local Rule 2016-1, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-1, Cole Schotz believes that such deviations are not material and respectfully requests that any such requirements be waived.

NOTICE

20. Consistent with the Interim Compensation Order, Cole Schotz will serve this Application upon the Fee Notice Parties and serve a notice of hearing on all parties that have requested notice in the Chapter 11 Case pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, Cole Schotz submits that no other or further notice is required.

CONCLUSION

WHEREFORE, Cole Schotz respectfully requests the Court enter an order: (i) granting the Application and authorizing monthly allowance of compensation in the amount of \$35,842.40 (80% of \$44,803.00) for professional services rendered, and reimbursement of actual and necessary costs in the amount of \$0.00 incurred, during the Monthly Period; (ii) granting the Application and authorizing final allowance of compensation in the amount of \$798,332.50 for professional services rendered, and reimbursement of actual and necessary costs in the amount of \$6,651.06 incurred, during the Final Period; (iii) authorizing the payment of the amounts requested in the Application; and (iv) granting such other and further relief as the Court may deem just and proper.

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Dated: November 19, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)
Melissa M. Hartlipp (No. 7063)
Elazar A. Kosman (No. 7077)
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– and –

Seth Van Aalten (admitted *pro hac vice*)
Sarah A. Carnes (admitted *pro hac vice*)
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*Counsel to the Official Committee of
Unsecured Creditors*